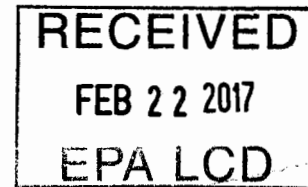




Clean Harbors Environmental Services, Inc.
42 Longwater Drive
P.O. Box 9149
Norwell, MA 02061-9149
781.792.5000
www.cleanharbors.com



Via First Class Mail

February 15, 2017

Kelly Bunker
Region 3 PCB Coordinator
USEPA REGION 3
1650 Arch Street
Mail Code: 3LC41
Philadelphia, PA 19103-2029

RE: NOTIFICATION OF CHANGE IN OWNERSHIP
CLEAN HARBORS PPM, LLC – PHILADELPHIA, PA FACILITY

Dear Ms. Bunker:

Clean Harbors PPM, LLC in Philadelphia, PA is the operator of an approved commercial storage and disposal facility for polychlorinated biphenyls (PCBs) under TSCA and is a wholly owned subsidiary of Clean Harbors Disposal Services, Inc. Clean Harbors is in the process of an internal reorganization and is looking to consolidate the operating permits of our PCB processing facilities under the ownership of a new entity. The new entity is named Transformer Services Holdco, LLC. We desire to transfer the ownership of the TSCA Approval operator to this new entity and would like to consummate this reorganization as soon as possible but are cognizant of permit requirements to provide advance notice of change in ownership.

The reorganization will have no impact on current operations. Clean Harbors PPM, LLC will continue to be the operator of the facility and the financial assurance for closure and liability will not change. The only difference is that the ownership of Clean Harbors PPM, LLC will change from one Clean Harbors entity to another Clean Harbors entity.

Based on conversations that you had with James Childress, Vice President of Compliance of Clean Harbors, it is our understanding that this change of ownership does not require any formal permit modifications to the TSCA Approval. The only requirement is that Clean Harbors provide this notification. Based on this, Clean Harbors requests waiver of any 90 day notice period that may be required under permitting regulations and a written confirmation to the undersigned at the address above that no further permit modifications are required.



Please call me or James Childress with any questions. I can be reached at (781) 792-5169 and James Childress can be reached at (615) 643-3175. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Will F. Connors". The signature is fluid and cursive, with a long horizontal stroke at the end.

William F. Connors
Sr. Vice President of Compliance

cc: James Childress, Vice President of Compliance
Charlotte Mooney, US EPA Headquarters via e-mail
Amanda Kohler, US EPA Headquarters via e-mail